

## **Slavery and Human Trafficking Statement (for the financial year ended 28 March 2022)**

### **Introduction**

We strive to always conduct our business honestly and with integrity. We also recognise that it is not acceptable to put profit above the welfare and wellbeing of our employees and those working on our behalf. Steps to combat modern slavery are therefore taken seriously, and efforts to prevent abuses are fully embedded across all departments throughout our organisation to ensure we play our part in helping to stamp out slavery and human trafficking.

This statement sets out the steps we have taken during our financial year that started on 29 March 2021 and ended on 28 March 2022 to ensure that modern slavery is not occurring in our supply chains or in our own organisation (which, for this purpose, includes those of our subsidiaries that own or rent property from which we carry on our business<sup>1</sup>). It has been prepared for the purpose of complying with section 54 of the Modern Slavery Act 2015 (the Act) and is to be interpreted in accordance with it.

When we refer to **we**, **our** or **us** in this statement, we mean Young & Co.'s Brewery, P.L.C. Further, references to **our business** are to the management and operation of a pub estate (which includes a hotel division) and the selling of food and drink through it. It also refers to the management and operation of tenanted and unlicensed properties, and our head office.

### **Our structure and activities**

We are a public company listed on AIM, the alternative investment market. Our head office is in London. Our activities are limited to England, principally London and the South.

### **Our supply chains**

Our supply chains include the sourcing of finished and raw materials, principally related to the provision of food and drink. These are rationalised to ensure we have a limited number of suppliers, thus allowing us to have considerable insight into our product source. Over 95% of our beers are supplied by seven leading UK-based breweries (Carlsberg Marston's, Heineken, AB Inbev UK, Beavertown, Diageo, Asahi UK and St Austell). Carlsberg Marston's is our distribution partner for each. All of our wines and spirits are supplied by Berkmann Wine Cellars Ltd. Furthermore, over 90% of our primary food supplies are supplied by select specific suppliers single suppliers, namely Solent Butchers Ltd., Frank Godfrey Ltd (meat) Premier Fruits Service Provider, Vegetarian Express (fruit and vegetables, dry store, frozen and deli produce), M&J Seafood Ltd (seafood), Paul Rhodes Bakery Ltd (bread).

All these suppliers have a clear stance on modern slavery which is aligned to our own.

### **Our policy on slavery and human trafficking**

We do not tolerate, and are committed to preventing, acts of slavery and human trafficking from occurring within our business and our supply chains.

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<sup>1</sup> Reference to ensuring that slavery and human trafficking is not taking part in any part of an organisation's supply chain does not mean that the organisation in question must guarantee that the entire supply chain is slavery free. Instead, it means an organisation must set out the steps it has taken in relation to any part of the supply chain (that is, it should capture all the actions it has taken). Source: "Transparency in Supply Chains etc. A practical guide" (issued under the Act).

## **Due diligence and risk management**

As part of our commitment to combating slavery and human trafficking, we have 'risk assessed' our supply chain, which, to date, has identified building contractors, cleaning companies, coffee suppliers and hospitality agency staff as our highest risk areas. We will continue to risk assess our supply chain to consider if certain groups of suppliers are more susceptible to modern slavery and if specific due diligence is required.

Further, to ensure, where practicable, optimum control of the work environment in our business, we:

- communicate to all our pub and hotel general managers an overview of modern slavery and how to identify indicators of modern slavery;
- include a modern slavery awareness section in the new general manager induction programme, including a process to raise concerns regarding modern slavery;
- expect all those who have, or seek to have, a commercial relationship with us to familiarise themselves with the Act and our zero-tolerance approach and to act consistently with this;
- ask any new suppliers to confirm that they will not allow slavery or human trafficking in their business or supply chains and that they have implemented policies and procedures to that effect;
- expect, as a minimum, each entity in our supply chains to adopt "one-up" due diligence on the next link in the chain;
- seek to include in our arrangements with suppliers a right to suspend or terminate our arrangements with them where we have reasonable grounds to suspect that there has been a breach of the Act;
- perform a weekly review of relevant documentation to verify all new employees are eligible to work in the UK;
- inspect payroll data on a weekly basis to confirm all employees are paid on or above the National Minimum Wage and National Living Wage, relevant to their age - the majority of employees are remunerated in excess of these amounts;
- mandate the suppliers of our hospitality agency staff check all employees are eligible to work in the UK;
- provide our operations managers and directors with access to rota information, allowing them to review employee weekly working hours;
- maintain a whistleblowing policy to encourage members of staff to report concerns about wrongdoing and which offers suitable protection for whistle-blowers; and
- subject relevant processes and procedures to periodic internal audit, to verify these are operating effectively;

## **Modern slavery risks in light of the coronavirus pandemic**

Whilst the coronavirus pandemic has clearly had a profound impact on our business through periods of managed house closures across the financial year, we do not believe this has posed new or increased modern slavery risks. Throughout the pandemic, we have continued to update the detailed guidance and procedures for our teams to follow to ensure they can continue to conduct their roles safely by preventing the spread of COVID-19 in our business.

## Effective actions to address modern slavery

This coming year we intend to continue to:

- ensure that each employee is eligible to work in the UK before commencing employment;
- verify that our employees are earning, at a minimum, at or above the National Minimum Wage or National Living Wage, relevant to their age;
- enable our operations managers and directors to monitor working hours of each employee;
- ensure each new material supplier is aware of our zero-tolerance stance and our expectations of them in this regard; we will request details of any modern slavery and human trafficking discovered in their supply chains and the actions they have taken;
- distribute this statement to all new permanent suppliers;
- provide training to relevant employees and workers within our business; and
- risk assess our supply chain, to identify if specific vendors (based on the goods or service they provide) may require additional due diligence.

A copy of this statement will be published on our website.

Our board of directors, which has agreed to champion the understanding and implementation of this statement, will be regularly briefed on the actions we have taken.

## Approval

This statement is made in accordance with Section 54(1) of the Act and constitutes our slavery and human trafficking statement for the financial year that started on 29 March 2021 and ended on 28 March 2022. It was approved by our board of directors on 18 May 2022 and signed on its behalf by.



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Patrick Dardis, Chief Executive

*Note: copies of previous statements are available on request from the company secretary.*